UNION CARBIDE CORPORATION
Silicones & Urethane Intermediates — Sistersville, WV

April 19, 1985

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SUBJECT: SSP HTS Fluid PCB Contamination

Please proceed immediately to remove the heat transfer fluid from the SSP heating system. Per our meeting on Friday, April 12, 1985, I have summarized our conclusions and action plans below:

Conclusions

1. Team agrees that all recent analyses indicate that the HTS fluid contains greater than 50 ppm PCB's. Range of the analyses was 73ppm - 190 ppm.

2. The legal definition of a closed system will not prevent changing the fluid. Revisions to sewers, piping, flooring, etc. will still be needed to conform with the law. Multiple leaks will still cause serious concerns. Revisions are expensive and the concern will continue as long as the system contains PCB's.

3. Team recommends changing the fluid as soon as possible. Other issues to deal with are as follows:

   Action plan needed to change out the initial fluid.

   Personnel protection (by law) - GWW/TGH
   Handling/disposal of fluid in drums - FED

Action Plans

* Define program to remove contaminated therminol with proper personnel protection and drum storage. TKI(TGH) - 4/19/85

* Purchase replacement therminol. JRB - Immediate

* Identify critical areas of sludge accumulation and physically clean as necessary. UAS - 4/22/85 - 4/29/85

* Isolate the clean section of the heat transfer system, fill with minimum amount of therminol, and circulate for 48 to 72 hours.

* Check for PCB's - if greater than 50ppm, remove material for disposal. If less than 50ppm, proceed to fill the rest of the system as planned.

* Drums for disposal are identified and disposed/stored as per PCB regulations. FED

* Ship drums of contaminated material to lowest cost approved disposal company. FED/JRB

* Follow up sampling program is executed per regulatory guidelines.

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